

1 LEONARD PEÑA (State Bar No. 192898)
2 PEÑA & SOMA, APC
3 479 South Marengo Ave.
4 Pasadena, CA 91101
5 Tel: (626) 396-4000
6 Fax: (626) 498-8875
7 lpena@penalaw.com

8 Attorneys for Plaintiff Carolyn A. Dye,
9 Chapter 7 Trustee

10 UNITED STATES BANKRUPTCY COURT
11
12 CENTRAL DISTRICT OF CALIFORNIA
13
14 LOS ANGELES DIVISION

15 In re:
16 URBAN COMMONS, LLC,
17 Debtor.

Case No. 2:21-bk-13523 WB
Chapter 7

18 CAROLYN A. DYE, Chapter 7
19 Trustee,

Adv. Proc. No. 2:23-ap-01302 WB

20 Plaintiff,

STIPULATION CONTINUING PRETRIAL
CONFERENCE

21 v.

Pretrial Conference Hearing:

22 FWREF NASHVILLE AIRPORT, LLC, a
23 Delaware limited liability
24 company
25 Defendant.

Date: April 15, 2024
Time: 2:00 PM
Place: 255 E. Temple St.
Los Angeles CA 90012
Ctrm: 1375

26 This Stipulation Continuing Pretrial Conference is entered
27 into between Plaintiff, Carolyn A. Dye, as Chapter 7 Trustee of
28 the estate of Urban Commons, LLC (the "Plaintiff") and Defendant
FWREF Nashville Airport, LLC (the "Defendant"), by and
through their respective counsel.

/ / /

/ / /

1 By this Stipulation, the parties seek to continue the
2 pretrial conference currently set for April 15, 2025, at 2:00 p.m.
3 to a date after June 15 2025, convenient to the Court.

4 The parties have settled this matter and are preparing the
5 the settlement agreement memorializing their agreement. The
6 process has taken longer than anticipated because not only does it
7 involve this adversary proceeding but also, if possible, other
8 related state court and appellate court matters in which
9 affiliates of the Debtor are in litigation with the Defendant in
10 this matter. The parties are attempting to craft a settlement
11 that will resolve all those matters. For these reasons, the
12 parties request a 60 day continuance to finalize their drafting of
13 the relevant settlement documents and for the Trustee to prepare
14 and file a compromise motion.

15
16 SO STIPULATED

17 RESPECTFULLY SUBMITTED THIS 14th DAY OF APRIL, 2025, 

18 LEONARD PEÑA

19 *Attorneys for Carolyn A. Dye,
Chapter 7 Trustee of Urban Commons, LLC*

20 Date: April 14, 2025

21 SARAH B. MILLER

22 *Attorneys for the Defendant
Admitted Pro Hac Vice*

23 Date: April 14, 2025
24
25
26
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 479 South Marengo Ave., Pasadena, CA 91101

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION EXTENDING DISCOVERY DEADLINE AND CONTINUING PRETRIAL CONFERENCE** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 4/14/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 4/14/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Honorable Julia W. Brand
United States Bankruptcy Court
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street, Suite 1382
Los Angeles, CA 90012

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):

Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

4/14/2025 NOEMI SANDOVAL
Date Printed Name

/S/ NOEMI SANDOVAL
Signature

TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Andrew W Caine on behalf of Defendant FWREF Nashville Airport, LLC, a Delaware limited liability
company acaine@pszjlaw.com

Carolyn A Dye (TR) trustee@cadye.com, c197@ecfcbis.com;atty@cadye.com

Jeffrey P Nolan on behalf of Defendant FWREF Nashville Airport, LLC, a Delaware limited liability
company jnolan@pszjlaw.com

Leonard Pena on behalf of Plaintiff Carolyn A Dye lpena@penalaw.com,
penasomaecf@gmail.com;penalr72746@notify.bestcase.com

United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov